

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Bay State Gas Company

D.T.E. 05-27

ATTORNEY GENERAL'S TWENTY-FIFTH SET OF
DOCUMENT AND INFORMATION REQUESTS

- AG-25-1 Refer to the Company's response to AG-6-4 where the Company states: "This inventory of coated unprotected steel main has been determined to have ineffective coating . . ." How did the Company determine that the mains have ineffective coating? What is the cause(s) of the coating being ineffective? Identify and produce copies of all reports, analyses and other documents regarding the ineffective coating.
- AG-25-2 Refer to the Company's response to AG-6-4 where the Company states: "This inventory of coated unprotected steel main has been determined to have ineffective coating . . ." Does the Company propose to replace these mains under its steel replacement program?
- AG-25-3 Produce copies of all DOT 7100 system reports submitted to DOT from 1990 to 1994. Produce all worksheets for DOT 7100 system reports from 1990 to 2005.
- AG-25-4 As part of DTE 97-97 the Company obtained a rate increase to replace corroded steel in its distribution system. Identify and produce copies of all reports, analysis and other documents that formed the basis of the Company's opinion in that case that it had an increasing corrosion problem on its distribution system.
- AG 25-5 Refer to the Company's response to AG-6-4, page 2 of 2. Does the Company only determine areas of "active corrosion" with leak surveys? What other methods does the Company employ? Since 1990, identify and produce copies of all reports, analyses or other documentation that conclude an area of active corrosion existed for the Brockton and Lawrence service areas.
- AG 25-6 Refer to the Company's response to AG-2-3. Produce copies of all soil resistivity tests for the Brockton and Lawrence service areas.

AG 25-7 In any of the Company services areas, is the Company experiencing an unusually high rate of leaks on any of its services? If “yes”, identify the service area and quantify the number and type of services involved. Produce all documents that support the conclusion that the Company is experiencing an unusually high rate of leaks on any of its services.

Date: June 22, 2005